



George Latimer  
County Executive

John M. Nonna  
County Attorney

July 10, 2024

**VIA ECF**

Hon. Vincent L. Briccetti  
U.S. District Court, Southern District of New York  
Charles L. Bricant Jr. Federal Building & Courthouse  
300 Quarropas Street, Courtroom 630  
White Plains, New York 10601

Re: *White Plains Aviation Partners, LLC, d/b/a Million Air White Plains v. County of Westchester*, No. 21 Civ. 5312 (VB)

Dear Judge Briccetti:

The County of Westchester and White Plains Aviation Partners, LLC, d/b/a Million Air White Plains ("Million Air"), write jointly pursuant to Your Honor's Order, dated June 7, 2024 (ECF No. 104), to update the Court regarding the status of their settlement discussions.

The parties have now reduced the terms of their interim settlement to writing, and the formal settlement documents have been approved by Million Air and the undersigned counsel. Portions of the interim settlement, along with a proposed lease amendment, are subject to approval by the Westchester County Board of Legislators ("BOL"). Given the limited summer meeting schedule of the BOL, the parties respectfully request a continued stay for the required legislative process to take place. If the stay is extended, the parties propose that they update the Court as to the status of their settlement on or before October 1, 2024.

The parties thank the Court for its consideration of their request.

Respectfully submitted,

Ross E. Morrison  
YANKWITT LLP  
Russell M. Yankwitt  
Ross E. Morrison  
140 Grand Street, Suite 705  
White Plains, New York 10601  
*Counsel for Plaintiff*

John M. Nonna  
JOHN M. NONNA  
Westchester County Attorney  
John M. Nonna  
Sean Carey  
Shawna C. MacLeod  
*Counsel for Defendant County*